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8 Attorneys for the Creditor, Ravin Skondin.
9

10 THE UNITED STATES BANKRUPTCY COURT
11 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12 In re:

13 PG&E CORPORATION,
14

15 -and-

16 In re:

17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

Debtors.

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric
21 ☒ Affects both Debtors

22 * All papers shall be filed in the lead case, No.
23 19-30088(DM)

) Case Nos. 19-30088 (DM)

) Chapter 11

) MOTION FOR RELIEF FROM
) AUTOMATIC STAY TO PERMIT THE
) COURTS OF THE STATE OF
) CALIFORNIA TO CONDUCT A JURY
) TRIAL AND RELATED PRETRIAL AND
) POST TRIAL MATTERS IN CONNECTION
) WITH CREDITOR, RAVIN SKONDIN'S
) COMPLAINT FOR DAMAGES, OR IN
) ALTERNATIVE, FOR ABSTENTION

) DATE: June 24, 2020
) TIME: 10:00 a.m.
) PLACE: Courtroom 17
) 450 Golden Gate Avenue,
) 16th Fl.
) San Francisco, California

) JUDGE: Hon. Dennis Montali

) OBJECTION DEADLINE: June 19, 2020 (4:00
) P.M. Prevailing Pacific Time

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25
26 TO: DEBTORS; THE UNITED STATES TRUSTEE; CREDITORS; OTHER
27 PARTIES IN INTEREST; AND THEIR RESPECTIVE ATTORNEYS OF RECORD:
28

1 Creditor, Ravin Skondin ("Ms. Skondin") hereby respectfully submits this Motion for Relief
2 from the Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial and
3 Related Pretrial and Post Trial Matters in Connection with Creditor, Ravin Skondin's Complaint for
4 Damages, or in Alternative, for Abstention (the "Motion") pursuant to 11 U.S.C. Section 362(d)(1),
5 for cause, or in the alternative for abstention pursuant to 28 U.S.C. Section 1334(c)(1).

6 This Motion seeks the entry of an order granting relief from the automatic stay to allow Ms.
7 Skondin to prosecute her Complaint for Damages filed with the Superior Court of the State of
8 California, in and for the County of San Francisco, on October 25, 2018, which includes causes of
9 action for: negligence, premises liability, public nuisance, inverse condemnation, trespass, and
10 private nuisance claims against PG&E Corporation and Pacific Gas and Electric Company
11 (collectively the "Debtors"), arising from the explosion and fire that occurred on January 12, 2017, at
12 real property located on 2209 South George Washington Boulevard, Yuba City, California. The
13 Complaint alleges that the Explosion was caused due to the Debtors' endemic failure to maintain
14 certain gas distribution lines and resulted in catastrophic injuries and loss of real and personal
15 property of Ms. Skondin.

16
17 This Motion seeks an order to allow Ms. Skondin to proceed against the Debtors, in order to
18 establish the liability of the Debtors, obtain judgment(s) against the Debtors, and collect any
19 judgment(s) obtained against the Debtors from the Debtors and/or their insurers, as applicable. In the
20 alternative, Ms. Skondin respectfully requests the Court to abstain from deciding the validity and
21 amount of her claims against the Debtors, in favor of the Courts of the State of California.

22 Dated: June 3, 2020

Respectfully submitted,

23 **DREYER BABICH BUCCOLA WOOD**
24 **CAMPORA, LLP**

25 By: 

26 Christopher W. Wood, Attorneys for
27 Ravin Skondin.

28 **PINO & ASSOCIATES**

By: 

Estela O. Pino, Attorneys for Ravin Skondin.